

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Amendment of Parts 73 and 74 of the	)	MB Docket No. 03-185
Commission's Rules to Establish Rules for Digital	)	
Low Power Television, Television Translator, and	)	
Television Booster Stations and to Amend Rules	)	
For Digital Class A Television Stations	)	

**COMMENTS OF  
RENARD COMMUNICATIONS CORP.**

Renard Communications Corp. ("RCC") hereby files the following comments regarding the above-captioned proceeding. RCC's use of "LPTV" is intended to refer to all LPTV, Class A and television translator stations.

**ANALOG SHUTOFF DATE**

The Commission has proposed an analog shutoff date sometime in 2012. This would be an unnecessary, premature and arbitrary requirement. Many LPTV stations in the LPTV service still operate in the analog mode, especially in smaller markets and rural areas. The National Broadband Plan's proposal of 2015 is far more realistic and practical. If MB Docket 03-185 were to be looked at alone and only from the Commission's perspective, one might conclude that 2012 might seem reasonable. However, in light of ET Docket No. 10-235 (FCC10-196) NPRM "Innovation in the Broadcast television Bands: Allocations, Channel Sharing and Improvements to VHF, Docket 03-185 cannot be looked at in a vacuum. That is to say, although Docket 03-185 does not specifically propose repacking the UHF television spectrum and encourage a transition to VHF as a means of providing more spectrum for wireless broadband

services, the current Commissioners have made it abundantly clear through speeches, comments, and press releases, etc. that it is their intention to do so. As a result, many LPTV will have to “dance” around what channel changes of full-power stations and many will be subject to displacement as was the case with the initial transition to digital by full-power stations. Then after the Commission’s initial Table of Allotments (“Table”) for the digital transition, there were many further changes made at the request of television broadcast stations who were not pleased with the actual results for the theoretical replications of service.

This caused further displacement to LPTV stations. Since the Commission has not presented any tentative Table for repacking, there would likely be chaos for LPTV stations to scramble in finding new usable channels that would not cause interference. In requiring LPTV stations to cease analog service in 2012 would cause a significant number of the same LPTV stations to waste time, money and resources in investing in technical facilities that would then only have to change again as a result of the Commission’s goal of repacking. Indeed, many LPTV stations who would invest in new UHF digital facilities, would find themselves being forced to abandon those facilities and soon after relocate themselves to VHF spectrum.

#### **USE OF FULL-POWER EMISSION MASK**

Although premature in its comments, RCC originally proposed in the Commission’s NPRM for “Replacement Translator” service for full-power stations that the Commission adopt a rule to permit LPTV stations to employ the use of full-power “masks” so as to be able utilize spectrum as efficiently as possible. The National

Broadband Plan suggested that permitting the use of full-power masks by LPTV stations be considered. RCC again endorses that the Commission adopt that provision.

### **INCREASED POWER FOR VHF**

The Commission has proposed in ET Docket No. 135 that VHF full-power stations be permitted an increase in power. However, it was silent with respect to LPTV. Through practical reception experiences by many broadcasters and research entities, it has been determined that for reliable VHF reception more power is needed. Therefore, RCC proposes that the original power of 3 kW ERP for LPTV VHF analog service be adopted for digital service as well.

Respectfully submitted,

**RENARD COMMUNICATIONS CORP.**

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